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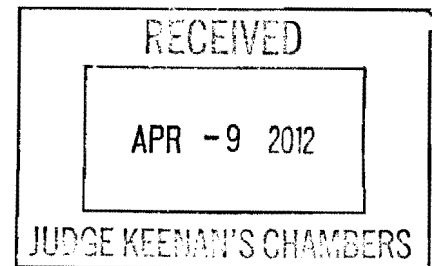
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MEMO ENDORSE

April 5, 2012

BY FIRST CLASS MAIL

Hon. John F. Keenan
United States District Court
500 Pearl Street, Room 1930
New York, NY 10007-1312



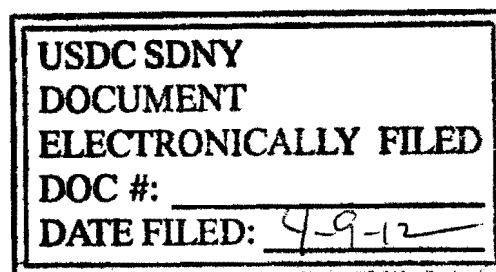
Re: General Patent Corporation v. Wi-LAN Inc., et al., No. 11 Civ. 6585 (JFK)

Dear Judge Keenan:

After consultation with Robert Forman, counsel for individual defendant Paul Lerner, and in an effort to address certain open discovery issues and scheduling conflicts, we write on behalf of all defendants, including our clients Wi-LAN Inc. and Gladios IP Inc., to respectfully request that the presently contemplated briefing schedule for our proposed motion for partial summary judgment be adjusted.

Specifically, while your Honor agreed at our March 19, 2012 conference that the defendants should file their respective motions by April 17, 2012, after which Plaintiff would have until June 18 to oppose and defendants would have until July 2 to submit their respective replies, we ask that your Honor permit all defendants up until May 25 to submit their respective motions. Consistent with the previously established timetable, we do not object if Plaintiff is given 60 days to file its opposition, provided that the defendants are thereafter given an additional two weeks to submit their reply papers.

We have spoken with Plaintiff's counsel concerning the foregoing and can represent that they do not object, provided that they reserve their right to seek additional time to oppose the motion, if appropriate.

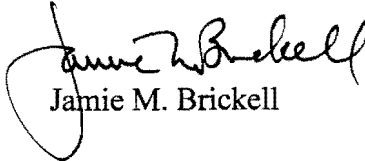


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Thank you in advance for your attention to this matter.

Respectfully submitted,



Jamie M. Brickell

cc: Levi Y. Silver, Esq. (email)
Elie C. Poltorak, Esq. (email)
Robert Forman, Esq. (email)

Application granted. Defendants may submit their motions by May 25, 2012. Plaintiff is to respond by July 24, 2012. Defendants' replies are due August 7, 2012. Oral argument, if requested, will be scheduled after all papers are filed.

SO ORDERED.

Dated: New York, N.Y.
April 9, 2012


U.S.D.J.